BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION DOCKET NO. R200 FF OF THE SECRETARY

NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES TO UNITED PARCEL SERVICE WITNESS RALPH L. LUCIANI (NAA/UPS-T5-1) June 16, 2000

The Newspaper Association of America hereby submits the attached interrogatories to United Parcel Service witness Ralph L. Luciani (NAA/UPS-T5-1) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

June 16, 2000

William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES TO UNITED PARCEL SERVICE WITNESS RALPH L. LUCIANI (NAA/UPS-T5-1)

NAA/UPS-T5-1: Please refer to your testimony at page 8, lines 5-7. Please explain what you mean by the "Commission's costing method" by which you distribute elemental load time. In particular, please describe the Commission's method which you use and how you applied it to the data.